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9 **Attorneys for Plaintiff**
10 **J & J Sports Productions, Inc.**

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN FRANCISCO DIVISION**

14 **J & J SPORTS PRODUCTIONS, INC.,**

15 **Plaintiff,**

16 **v.**

17 **MARCELA CATENA,**

18 **Defendant.**

19 **CASE NO. 3:14-cv-03959-VC**

20 **PLAINTIFF'S *EX PARTE***
21 **APPLICATION FOR AN ORDER**
22 **CONTINUING THE CASE**
23 **MANAGEMENT CONFERENCE; AND**
24 **ORDER ~~(Proposed)~~**

25 **TO THE HONORABLE VINCE CHHABRIA, THE DEFENDANTS AND THEIR**
26 **ATTORNEY/S OF RECORD:**

27 Plaintiff J & J Sports Productions, Inc., hereby applies *ex parte* for an order continuing the Case
28 Management Conference presently set for Tuesday, December 2, 2014 at 10:00 AM. As set forth
below Plaintiff respectfully requests that the Court continue the Case Management Conference to a new
date approximately Thirty (30) to Forty-Five (45) days forward.

The request for the brief continuance is necessitated by the fact that Plaintiff has not yet
perfected service of the initiating suit papers upon the Defendant Marcela Catena, individually and
d/b/a El Rincon de las Empanadas. As a result, Plaintiff's counsel has not conferred with the
defendant concerning the claims, discovery, settlement, ADR or any of the other pertinent issues
involving the case itself or the preparation of a Joint Case Management Conference Statement.

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1 Plaintiff recently identified an alternative address that it believes will be successful to serve
2 its initiating suit papers, upon the Defendant.

3 **WHEREFORE**, Plaintiff respectfully requests that this Honorable Court continue the Case
4 Management Conference, presently scheduled for Tuesday, December 2, 2014 at 10:00 AM.

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7 Respectfully submitted,

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10 Dated: November 20, 2014

/s/ Thomas P. Riley

LAW OFFICES OF THOMAS P. RILEY, P.C.

By: Thomas P. Riley

Attorneys for Plaintiff

J & J Sports Productions, Inc.

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ORDER (~~Proposed~~)

It is hereby ordered that the Case Management Conference in civil action number 3:14-cv-03959-VC styled *J & J Sports Productions, Inc. v. Catena*, is hereby continued from 10:00 AM, Tuesday, December 2, 2014 to January 6, 2015.

Plaintiff shall serve a copy of this Order on the Defendant and thereafter file a Certification of Service of this Order with the Clerk of the Court.

IT IS SO ORDERED:



Dated: November 26, 2014

THE HONORABLE VINCE CHHABRIA
United States District Court
Northern District of California

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PROOF OF SERVICE (SERVICE BY MAIL)

I declare that:

I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena, California. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On November 20, 2014, I caused to serve the following documents entitled:

PLAINTIFF'S *EX PARTE* APPLICATION FOR AN ORDER CONTINUING THE CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was addressed to:

Marcela Catena (Defendant)
931 23rd Street
Richmond, CA 94804

The fully sealed envelope with pre-paid postage was thereafter placed in our law firm's outbound mail receptacle in order that this particular piece of mail could be taken to the United States Post Office in South Pasadena, California later this day by myself (or by another administrative assistant duly employed by our law firm).

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct, and that this declaration was executed on November 20, 2014, at South Pasadena, California.

Dated: November 20, 2014

/s/ Vanessa Morales

VANESSA MORALES